

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

DAVID LANE JOHNSON,

Plaintiff,

v.

NATIONAL FOOTBALL LEAGUE
PLAYERS ASSOCIATION, ET AL.,

Defendants.

Civil Action No. 1:17-cv-05131-RJS

**NOTICE OF MOTION FOR
SUMMARY JUDGMENT**

ORAL ARGUMENT REQUESTED

PLEASE TAKE NOTICE THAT upon the accompanying Memorandum of Law in Support of its Motion for Summary Judgment, dated November 9, 2018; Declaration of David L. Greenspan, dated November 9, 2018, and exhibits thereto; Declaration of Stephen M. Saxon, dated November 8, 2018; and Declaration of Heather M. McPhee, dated November 2, 2018, Defendant National Football League Players Association (“NFLPA”) hereby moves this Court, before the Honorable Richard J. Sullivan, United States Courthouse for the Southern District of New York, 40 Foley Square, Room 2104, New York, NY 10007, on a date and at a time to be designated by the Court, for summary judgment pursuant to Federal Rule of Civil Procedure 56 against Plaintiff David Lane Johnson’s Labor Management Reporting and Disclosure Act claim.

PLEASE TAKE FURTHER NOTICE THAT any opposing affidavits and answering memoranda shall be served by November 30, 2018, as specified in the Court’s Order dated October 23, 2018 (ECF No. 131).

Dated: New York, New York
November 9, 2018

Respectfully submitted,

s/ Jeffrey L. Kessler

Jeffrey L. Kessler

David L. Greenspan

Jonathan J. Amoon

Isabelle Mercier-Dalphon

Winston & Strawn LLP

200 Park Avenue

New York, NY 10166-4193

Telephone: (212) 294-4698

Facsimile: (212) 294-4700

Email: JKessler@winston.com

Email: DGreenspan@winston.com

Email: JAmoon@winston.com

Email: IMercier@winston.com

Attorneys for Defendant

National Football League Players Association